

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY

Caption in compliance with D.N.J. LBR 9004-1

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Attorneys for Eric R. Perkins, Chapter 7 Trustee

In re:

CHARLES PATTERSON WRIGHT, II AND
KANYANAT WRIGHT,

Debtors.

Chapter 7

Case No. 17-31543 (RG)

Honorable Rosemary Gambardella,
U.S.B.J.

Hearing Date: July 15, 2019 at 10:00
a.m.

**NOTICE OF MOTION FOR AN ORDER APPROVING THE PRIVATE SALE OF THE
DEBTORS' RESIDENCE PURSUANT TO 11 U.S.C. § 363, FREE AND CLEAR OF ANY
LIENS, CLAIMS, AND ENCUMBRANCES INCLUDING BUT NOT LIMITED TO ANY
JUDGMENTS OF 1) ST. CLARE'S HEALTH SYSTEM; 2) CHILTON MEMORIAL
HOSPITAL; 3) AHS HOSPITAL CORP D/B/A/ MORRISTOWN MEMORIAL AND
4) CATE WRIGHT**

TO: St. Clare's Health System
25 Pocono Road
Denville, NJ 07834

Chilton Memorial Hospital
a/k/a Chilton Medical Center
97 West Parkway
Pompton Plains, NJ 07444

AHS Hospital Corp. d/b/a
Morristown Memorial Hospital
100 Madison Avenue
Morristown, NJ 07960

Cate Wright
69 Jamestown Drive
Guilford, CT 06437

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Hackensack, NJ 07601
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Counsel for purchaser, Joseph Barba

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Levitt & Slafkes, PC
515 Valley Street, Suite 140
Maplewood, NJ 07040
Counsel for Casey Wright

Knuckles, Komosinski & Manfo, LLP
50 Tice Boulevard, Suite 183
Woodcliff Lake, NJ 07677
Counsel for MTGLQ Investors, LP

A.J. Willner Auction
560 Springfield Avenue, Suite J
Springfield, NJ 07081

PLEASE TAKE NOTICE that on July 15, 2019, at 10:00 a.m., or as soon thereafter as counsel may be heard, Eric R. Perkins, the Chapter 7 Trustee (the “Trustee”) for the Estate of Charles Patterson Wright II and Kanyanat Wright (the “Debtors”), by and through his attorneys, McElroy, Deutsch, Mulvaney & Carpenter, LLP shall move before the Honorable Rosemary Gambardella of the United States Bankruptcy Court for the District of New Jersey at the United States Bankruptcy Court, 50 Walnut Street, 3rd Floor, Newark, New Jersey 07102., for the entry of an *Order Approving the Private Sale of the Debtors’ Residence Pursuant to 11 U.S.C. § 363, Free and Clear of any Liens, Claims and Encumbrances, including but not limited to any*

Judgments of 1) St. Clare's Health System, 2) Chilton Memorial Hospital, 3) AHS Hospital Corp. d/b/a Morristown Memorial and 4) Cate Wright.

PLEASE TAKE FURTHER NOTICE that the undersigned shall rely upon the Application annexed hereto. A proposed form of Order is also submitted herewith.

PLEASE TAKE FURTHER NOTICE that pursuant to D.N.J. LBR 9013-2(a)(2) all responding papers must be filed with the Clerk of the Bankruptcy Court and the attorneys for the Trustee within seven (7) days of the return date of this Motion.

PLEASE TAKE FURTHER NOTICE that in accordance with D.N.J. LBR 9013-1(a)(3) no brief is necessary since there are no legal issues in dispute.

PLEASE TAKE FURTHER NOTICE that pursuant to D.N.J. LBR 9013-3(d) the Trustee hereby requests oral argument only if this Motion is opposed.

PLEASE TAKE FURTHER NOTICE that pursuant to D.N.J. LBR 9013-3(a), in the event the Motion is contested, there is a duty to confer to determine whether a consent order may be entered disposing of the Motion or to stipulate to the resolution of as many issues as possible.

PLEASE TAKE FURTHER NOTICE that unless objections are timely filed and served, the motion shall be deemed uncontested in accordance with D.N.J. LBR 9013-3(d), and the relief requested may be granted without a hearing.

**McELROY, DEUTSCH, MULVANEY,
& CARPENTER, LLP**
Attorneys for Chapter 7 Trustee, Eric R. Perkins

/s/ Virginia T. Shea
Virginia T. Shea

Dated: June 20, 2019